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Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re

Chapter 11

MARTIN CADILLAC, L.L.C.,

Case No. 10-29520 (RG)

Debtor and Debtor-in-Possession.

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER, PURSUANT TO 11 U.S.C.
§§ 105(a) AND 364(b) AND FED. R. BANKR. P. 4001(c) (A) AUTHORIZING THE
DEBTOR-IN-POSSESSION TO OBTAIN POST-PETITION FINANCING PURSUANT
TO SECTION 364 OF THE BANKRUPTCY CODE, (B) GRANTING LIENS, SECURITY
INTERESTS AND SUPER-PRIORITY CLAIMS IN CONNECTION THEREWITH, AND
(C) GRANTING CERTAIN OTHER RELIEF RELATING THERETO**

PLEASE TAKE NOTICE THAT Martin Cadillac, L.L.C., the above-captioned debtor and debtor-in-possession (the "Debtor"), by and through its counsel, is hereby moving the United States Bankruptcy Court for the District of New Jersey (Newark Vicinage), located at Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, NJ 07102 (the "Bankruptcy Court"), for an order, substantially in the form submitted herewith, pursuant to 11 U.S.C. §§ 105(a) and 364(b) and Fed. R. Bankr. P. 4001(c), (A) authorizing the Debtor to obtain post-petition financing pursuant to Bankruptcy Code Section 364, (B) granting liens, security interests and super-priority claims in connection therewith, and (C) granting certain other relief relating thereto (the "Motion").

PLEASE TAKE FURTHER NOTICE that the Debtor shall be relying upon the Verified Application submitted herewith in support of the Motion, along with the Exhibit thereto, and the record of this Chapter 11 case.

PLEASE TAKE FURTHER NOTICE that, at a hearing held on October 26, 2010, the Court granted the Debtor's request to schedule a hearing on the Motion on shortened notice. A hearing on the Motion shall be held on November 8, 2010 at 11:00 a.m. (local time), or as soon thereafter as counsel can be heard, before the Honorable Rosemary Gambardella, United States Bankruptcy Judge, in Courtroom 3E of the Bankruptcy Court at the address set forth above.

PLEASE TAKE FURTHER NOTICE that, at the October 26, 2010 hearing, the Court directed that opposition papers and/or responsive papers to the Motion, if any, be filed on or before November 3, 2010, and that reply papers, if any, be filed on or before November 5, 2010 by 12:00 noon (local time). Opposition papers and/or responsive papers, if any, to the Motion must be in writing and filed with the Bankruptcy Court in accordance with the applicable Local Bankruptcy Rules and General Orders of the Bankruptcy Court.

Dated: October 29, 2010

Respectfully submitted,

OKIN, HOLLANDER & DELUCA, L.L.P.,
Attorneys for Martin Cadillac, L.L.C.,
Debtor and Debtor-in-Possession

By: /s/ Gregory S. Kinoian
Gregory S. Kinoian